

EDWARD HAN (SB# 196924)
edwardhan@paulhastings.com
JESSICA E. MENDELSON (SB# 280388)
jessicamendelson@paulhastings.com
PAUL HASTINGS LLP
1117 S. California Avenue
Palo Alto, California 94304
Telephone: (650) 320-1800
Facsimile: (650) 320-1900

JENNIFER BALDOCCHI (SB#168945)
jenniferbaldocchi@paulhastings.com
TIMOTHY D. REYNOLDS (SB# 274589)
timothyreynolds@paulhastings.com
PAUL HASTINGS LLP
515 South Flower Street, 25th Floor
Los Angeles, California 90071
Telephone: (213) 683-6000
Facsimile: (213) 627-0705

Attorneys for Defendants
Translucence Research, Inc., Benjamin
Fisch, Charles Lu, Nathan McCarty,
Benedikt Bünz, and Binyi Chen

Craig A. Hansen (SB# 209622)
Email: craig@hansenlawfirm.net
Stephen C. Holmes (SB# 200727)
Email: steve@hansenlawfirm.net
Philip E. Yeager (SB# 265939)
Email: phil@hansenlawfirm.net
Collin D. Greene (SB# 326548)
Email: collin@hansenlawfirm.net
HANSEN LAW FIRM, P.C.
75 E. Santa Clara Street, Suite 1150
San Jose, CA 95113-1837
Telephone: (408) 715 7980
Facsimile: (408) 715 7001

Attorneys for Plaintiffs
Temujin Labs Inc., a Delaware
corporation, and Temujin Labs Inc., a
Cayman Islands corporation

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

TEMUJIN LABS INC., a Delaware
corporation, and TEMUJIN LABS INC., a
Cayman Islands corporation

Plaintiffs,

vs.

TRANSLUCENCE RESEARCH, INC., a
Delaware corporation, BENJAMIN FISCH,
CHARLES LU, BENEDIKT BÜNZ,
NATHAN MCCARTY, FERNANDO
KRELL, PHILIPPE CAMACHO CORTINA,
BINYI CHEN, AND LUOYUAN (ALEX)
XIONG, and DOES 1-20,

Defendants.

CASE NO. 5:21-cv-09152-NC

**STIPULATION EXTENDING
DEFENDANT BINYI CHEN'S TIME TO
RESPOND TO THE COMPLAINT**

STIPULATION

Pursuant to Civil Local Rule 6-1, Plaintiffs Temujin Labs Inc. (Delaware) and Temujin Labs Inc. (Cayman) (collectively “Plaintiffs”) and Defendant Binyi Chen hereby stipulate and agree as follows:

WHEREAS, Plaintiffs filed the operative complaint in this action on November 24, 2021 (the “Complaint”) (Dkt. No. 1);

WHEREAS, Defendants Translucence Research, Inc., Charles Lu, Benjamin Fisch, and Nathan McCarty timely filed a Motion to Dismiss the Complaint on March 18, 2022 (the “Motion to Dismiss”) (Dkt. No. 26);

WHEREAS, the Motion to Dismiss is fully briefed and presently set for hearing before this Court on January 4, 2023 (Dkt. Nos. 52, 53);

WHEREAS, Plaintiffs filed a proof of service of the Summons and Complaint on November 9, 2022, indicating that Plaintiffs personally served defendant Binyi Chen (“Chen”) on October 30, 2022 (Dkt. No. 54);

WHEREAS, the parties recognize that requiring Chen to move against, answer, or otherwise respond to the Complaint while the fully briefed Motion to Dismiss is pending is inefficient and may unnecessarily waste judicial and party resources, and therefore the parties agree to allow Chen to move against, answer or otherwise respond to the Complaint at a future date following the Court’s decision on the pending Motion to Dismiss;

NOW THEREFORE THE PARTIES STIPULATE AND AGREE AS FOLLOWS:

1. Chen’s deadline to move against, answer, or otherwise respond to the Complaint shall be extended to fourteen (14) days following notice of the Court’s decision on the Motion to Dismiss; and

2. In the event the Court grants the Motion to Dismiss and grants Plaintiffs leave to file an amended complaint, undersigned counsel for Chen agree to accept service of any amended complaint on behalf of Chen and Chen’s deadline to move against, answer, or otherwise respond to any amended complaint shall be fourteen (14) days from the date of service

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1 of the amended complaint on undersigned counsel.

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3 DATED: November 16, 2022

PAUL HASTINGS LLP

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5 By: /s/ Edward Han

6 EDWARD HAN

7 Attorneys for Defendants
8 Translucence Research, Inc., Benjamin Fisch,
9 Charles Lu, Nathan McCarty, Benedikt Bünz, and Binyi
10 Chen

11 DATED: November 16, 2022

HANSEN LAW FIRM, P.C.

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13 By: /s/ Craig A. Hansen

14 CRAIG A. HANSEN

15 Attorneys for Plaintiffs
16 Temujin Labs Inc., a Delaware corporation, and Temujin
17 Labs Inc., a Cayman Islands corporation
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